

EXHIBIT 2

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

--oOo--

WAYMO LLC,

Plaintiff,

Case

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

_____/

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VIDEOTAPED DEPOSITION OF ALEXANDER (SASHA) ZBROZEK

VOLUME II

WEDNESDAY, SEPTEMBER 6, 2017

Reported by:

Anrae Wimberley

CSR No. 7778

Job No. 2693569

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1 A. No. I am asking you to define "low value." 14:38:00

2 Q. Those are your words. 14:38:03

3 A. So I will say that this is a very relative 14:38:06

4 thing. And Google data policies were designed with 14:38:14

5 code and user data in mind and were perhaps not the 14:38:18

6 greatest fit for the kind of data that we wanted to 14:38:20

7 store and that relative to instantly Google ending 14:38:28

8 data breaches, that the data that was in the 14:38:32

9 Subversion server would be considered of lesser value. 14:38:36

10 But by how much, I don't know; and in absolute terms, 14:38:40

11 I have no idea. 14:38:41

12 Q. All right. Bryan Salesky was your boss at 14:38:45

13 the time? 14:38:45

14 A. I don't think so. 14:38:47

15 Q. Who was Bryan Salesky to you at that time? 14:38:50

16 MR. BAKER: Objection to form. 14:38:51

17 THE WITNESS: I don't remember for sure, but I 14:38:53

18 think he was my skip-level manager. 14:38:57

19 BY MR. GONZALEZ: 14:38:57

20 Q. Somebody that you reported to? 14:38:59

21 A. Not quite. I had a manager that I reported 14:39:03

22 to. Bryan was not that manager. I don't remember the 14:39:08

23 org. chart exactly, especially in 2015, but I think 14:39:13

24 that my -- I think that Bryan was my manager's 14:39:22

25 manager, but that is all researchable. 14:39:25

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1 FEDERAL CERTIFICATE OF DEPOSITION OFFICER
2 I, ANRAE WIMBERLEY, CSR NO. 7778, do hereby
declare:

3 That, prior to being examined, the witness named
in the foregoing deposition was by me duly sworn
4 pursuant to Section 30(f)(1) of the Federal Rules of
Civil Procedure and the deposition is a true record of
5 the testimony given by the witness;

That said deposition was taken down by me in
6 shorthand at the time and place therein named and
thereafter reduced to text under my direction;

7 ----- That the witness was requested to
8 review the transcript and make any changes to the
transcript as a result of that review pursuant to
9 Section 30(e) of the Federal Rules of Civil Procedure;

----- No changes have been provided by the
10 witness during the period allowed;

11 ----- The changes made by the witness are
12 appended to the transcript;

--X--- No request was made that the transcript
13 be reviewed pursuant to Section 30(e) of the Federal
14 Rules of Civil Procedure.

15 I further declare that I have no interest in the
event of the action.

16 I declare under penalty of perjury under the laws
17 of the United States of America that the foregoing is
true and correct.

18 WITNESS my hand this 7th day of September, 2017.
19
20
21
22
23

24 <%signature%>

25 ANRAE WIMBERLEY, CSR NO. 7778